

EXHIBIT 11

Coffee County Breach Discovery Related Activities Preliminary Summary

Plaintiff CGG seeks sanctions in this case related to the misconduct of HBS and CCBOER throughout the discovery efforts. Plaintiff acknowledges inability to precisely discern the incremental cost of specific acts of misconduct should not benefit CCBOER's and HBS's for their misconduct. Plaintiff legal and expert team's preliminary estimates of their Coffee-breach related discovery time is summarized in the declarations and below to provide the Court with an understanding of the scope of Plaintiff's legal and expert team's investment to date.

Bruce Brown, Attorney—322.3 hours at \$625 = \$201,437.50

Cary Ichter, Attorney – \$77, 333. 83 (Doc. 60-@)

Kevin Skoglund, Expert—Decl. @ 92.5 Excess Work and 400 additional Coffee-breach related hours , Total \$246,250

Philip Stark, Expert—Decl (Doc. 60-10) 100 hours @ \$1,800 per hour --\$180,000

Susan Greenhalgh, Expert -Decl (Doc. 60-12) 247 hours (111 billed) + Exh.9 (5.25 hours)=\$34,875

Marilyn Marks—Litigation Support—Decl. (Doc. 60-4) and Exh @ = 87.5 hours in addition to over 2,500 hours of Coffee-breach related time, greater than \$300,000